

BEFORE THE
FEDERAL ELECTION COMMISSION
OF THE
UNITED STATES OF AMERICA

2011 JUL 12 PM 1:43

OFFICE OF GENERAL
COUNSEL

In the Matter of:

Russia Today Television (RTTV)

MUR # 6481

Complaint

AMERICA'S SURVIVAL INC., is a 501(c)(3) educational organization specializing in exposing the United Nations, international organizations and extremist movements. Its principal place of business is at 8221 Francis Lane, Owings, MD 20736. This complaint is filed with the Federal Election Commission (FEC) pursuant to the amendments to the Foreign Agents Registration Act concerning the ban on political contributions by foreign nationals enacted in 1966 and the authority which gave the Federal Election Commission jurisdiction over the prohibition in 1974.

The Respondent is Russia Today Television network (RTTV), funded by the government of Russia and registered as a foreign corporation in the U.S., which provided air time for one of its employees, Adam Kokesh, to promote and raise funds for a 2012 American presidential candidate, Rep. Ron Paul, in apparent violation of the ban on political contributions and expenditures by foreign nationals. Foreign corporations are prohibited from "contributing, donating or spending funds in connection with any federal, state, or local election in the United States, either directly or indirectly," according to the FEC. Rep. Paul is an officially announced Republican candidate for president in 2012 (see <http://www.ronpaul2012.com/>). The apparent purpose of this electioneering by a foreign corporation based in Russia is to divide and weaken the Republican Party as it enters the 2012 presidential election season, thus making it more likely that President Barack Obama and his political party will succeed. Hence, this appears to constitute blatant interference in U.S. elections.

Respondent

RTTV AMERICA, INC., 1325 G Street NW #250, O.O, Washington, DC, 20005. (202) 942-7440.

Facts

The facts in this complaint are based on an episode of the RTTV program, "Adam vs The Man" hosted by Adam Kokesh, an employee of the channel who refuses to discuss how much money he is being paid by the Russian regime of Vladimir Putin, the former KGB officer and current Prime Minister, and which aired on June 6, 2011 on RTTV. The clip from this episode used in the complaint can be found on YouTube.¹ The entire transcript from this clip is presented as evidence in this complaint. Kokesh is a former Republican candidate for Congress in New Mexico in 2010 and, according to FEC records, received a \$3000.00 contribution from the Liberty PAC associated with Rep. Ron Paul.

¹ YouTube.com "Ron Paul 2012" <http://www.youtube.com/watch?v=wrZ1eug-Gs4&feature=youtu.be>

On June 6, 2011 Adam Kokesh ended his Monday night show with remarks that go beyond merely reporting the news to endorsing Presidential candidate Ron Paul and highlighting a "money bomb" and fundraising for him. Kokesh noted on June 5, 2011 (the previous day) that over \$1 million was raised. The transcript reads as follows:

"I'd like to end tonight on a note of some good news. We have some good news from the front lines of the Ron Paul 'I LOVE' election with our money bomb on June 5. I was happy to donate to that. Yesterday we raised over 1 million dollars for the Ron Paul campaign. And I'm starting to figure out what electable means, because electable or non-electable is really a code word for 'if this person wins, I'm not gonna be able to get as much money from the government'. But if you want electable, please support the reelection campaign of President Barack Obama. If you want a President whose going to honor his oath to the constitution and your freedom; I urge you to support none other than Congressman Ron Paul."

Note that Kokesh, an RTTV employee, publicly endorses Ron Paul: "I urge you to support none other than Congressman Ron Paul," and mentions that he was "happy to donate to that [Ron Paul money bomb]". This is clearly a political contribution consisting of valuable air time, provided by a foreign corporation, and airing in the U.S.

RT America broadcasts from its studio in Washington, D.C. and its web site <http://rt.com/on-air/rt-america-air/> says it reaches the following areas of the U.S.:

- New York State and North East US

New York City & Northern New Jersey - Time Warner Cable channel 135;
Buffalo, NY - Time Warner Cable channel 194;
Rochester, NY - Time Warner Cable channel 194;
Binghamton, NY - Time Warner Cable channel 196;
Syracuse, NY - Time Warner Cable channel 196;
Portland, ME - Time Warner Cable channel 159;
Augusta, ME - Time Warner Cable channel 195;

- DC Metro Area

Comcast -- channel 274;
Verizon Fios -- channel 455;
Cox Cable -- channel 473;
RCN Cable -- channel 33;
Over the Air -- digital channel 30.4;
Dish Networks (DC Area Only) -- channel 8084.

- California

Los Angeles -- Time Warner Cable channel 236;
San Diego & North County -- Time Warner Cable channel 222;
South San Diego (Banning & Yucca Valley) - Time Warner Cable channel 236;

Greater San Francisco Bay Area -- Comcast Cable channel 103.

Includes the cities of: Daly City, Union City, Pacifica, Marin County, Rhonert Park, Santa Rosa, Petaluma, Napa, San Jose, Cupertino, Sunnyvale, Milpitas, Fremont, Hayward, Newark, Foster City, Montlurey, Vacaville, Fairfield, Pleasanton, Livermore, Danville, Concord, Clayton, Pleasant Hill, Martinez, Lafayette, Walnut Creek, Orinda, Moraga, Pittsburg, Antioch, Brentwood, Vallejo.

- Chicago & Midwest Region

Comcast Cable - channel 103;

Includes the cities of: Carpentersville, IL; Dekalb, IL; Elmhurst, IL; Griffith, IN; Hammond, IN; Homewood, IL; Kankakee, IL; La Grange, IL; Lake Zurich, IL; MChenry, IL; Michigan City, IN; Mount Prospect, IL; Portage, IN; Rochelle, IL; Rolling Meadow, IL; Romeoville, IL; Skokie, IL; Streamwood, IL; Waukegan, IL; Wheaton, IL.

- Chicago & Midwest Region

Comcast Cable - channel 103;

Includes the cities of: Carpentersville, IL; Dekalb, IL; Elmhurst, IL; Griffith, IN; Hammond, IN; Homewood, IL; Kankakee, IL; La Grange, IL; Lake Zurich, IL; MChenry, IL; Michigan City, IN; Mount Prospect, IL; Portage, IN; Rochelle, IL; Rolling Meadow, IL; Romeoville, IL; Skokie, IL; Streamwood, IL; Waukegan, IL; Wheaton, IL.

Apparent Violations

The June 6, 2011 airing of "Adam vs The Man" on RT TV endorsing Congressman Ron Paul for President and encouraging monetary donations to Ron Paul's campaign appear to be violations of the Federal Election Campaign Act and Federal Election Commission Regulations.

This endorsement appears in the transcript of the show (appearing in this document) and also on the YouTube website showing the clip of this episode.

The Federal Elections Commission prohibits political contributions and expenditures by foreign nationals, including foreign corporations.

RTTV America, Inc. is a Foreign Business Corporation. Foreign corporations are considered foreign nationals and therefore are prohibited from taking these actions.

Conclusion

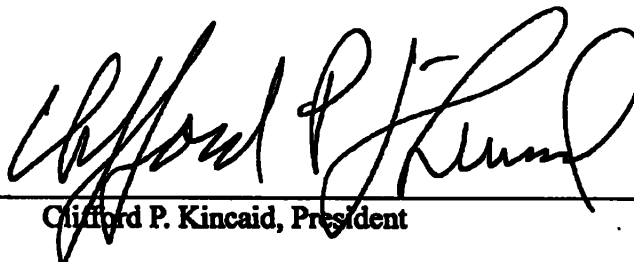
The endorsement of a Presidential candidate and the raising of funds on the air for a presidential candidate by this foreign corporation operating in the United States are apparent violations of the FEC laws and regulations prohibiting these actions by foreign nationals.

America's Survival Inc. urges the Federal Election Commission to look into this matter and immediately initiate an investigation into the facts presented in this complaint.

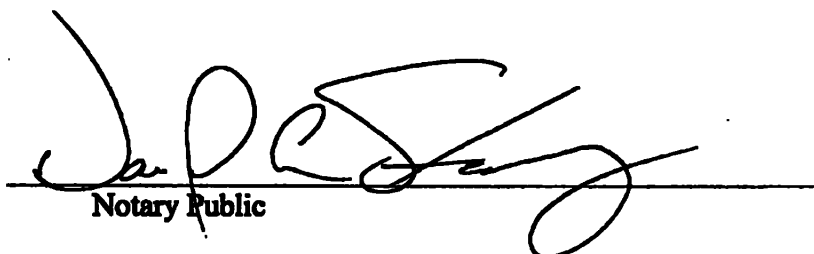
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Complainant, upon information and belief and relying upon the transcript and video cited herein, swears under penalty of perjury that the statements and facts in this complaint are true and correct to the best of his knowledge and belief.

AMERICA'S SURVIVAL, INC.


Clifford P. Kincaid, President

Subscribed and sworn before me this 1st day of July 2011


Notary Public

Seal

My commission expires

DAVID A. STAVELY, NOTARY PUBLIC
CALVERT COUNTY
STATE OF MARYLAND
MY COMMISSION EXPIRES JULY 1, 2013

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